

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MONIQUE RUSSELL, JASMINE RIGGINS,
ELSA M. POWELL, and DESIRE EVANS,

Plaintiffs,

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES,

Defendant.

Civil Action No. 18-5629

Honorable Joshua D. Wolson

SUPPLEMENT TO DEFENDANT’S UNOPPOSED MOTION TO SEAL

Defendant Educational Commission for Foreign Medical Graduates (“ECFMG”), by and through its undersigned counsel, respectfully submits this Supplement to the Unopposed Motion to Seal (ECF 38). Pursuant to the Court’s Order dated October 30, 2019 (ECF 44), attached hereto are redacted versions of Exs. 11, 12, 13, 14, 18, 21, 25, 26, 27, 28, 29, 30, 31, and 32 (ECF 39-11, 39-12, 39-13, 39-14, 39-18, 39-21, 39-25, 39-26, 39-27, 39-28, 39-29, 39-30, 39-31, and 39-32) to ECFMG’s Opposition to Plaintiffs’ Motion for Class Certification (ECF 39). Also attached hereto are unredacted versions of Exs. 19 and 20 (ECF 39-19 and 39-20) for which Plaintiffs’ counsel have not identified any information warranting redaction or sealing.

As to Exs. 36 and 37 (ECF 39-36 and 39-37), Plaintiffs’ position is as follows: The discovery deposition transcripts of the Plaintiffs Desire Evans and Elsa Powell contain sensitive information relating to sexual and physical abuse, mental health/psychiatric history, unrelated aspects of medical history, and inquiry regarding illicit and illegal drug use, among other personal and sensitive topics. The scope of these depositions extends beyond the procedural issue of class certification. While the Plaintiffs have undertaken to redact specific elements of

other exhibits where possible, given the broad nature of these discovery depositions, the Plaintiffs respectfully request that these documents be sealed in their entirety, rather than undergo extensive redactions.

ECFMG does not oppose Plaintiffs' request that Exs. 36 and 37 be sealed in their entirety.

Respectfully submitted,

Dated: November 6, 2019

/s/ Brian W. Shaffer

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CERTIFICATE OF SERVICE

I do hereby certify that on this date, I caused true and correct copies of the foregoing document to be served via electronic filing upon all counsel of record via the ECF system and/or e-mail.

DATED: November 6 2019

/s/ Brian W. Shaffer
Brian W. Shaffer